

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department of Telecommunications and Energy on its own Motion into the Appropriate Pricing, based upon Total Element Long-Run Incremental Costs, for Unbundled Network Elements and Combinations of Unbundled Network Elements, and the Appropriate Avoided Cost Discount for Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services in the Commonwealth of Massachusetts

**D.T.E. 01-20**

**CONVERSENT COMMUNICATIONS OF MASSACHUSETTS, LLC'S  
REPLY COMMENTS TO VERIZON MASSACHUSETTS' REPLY TO THE MOTIONS  
FOR RECONSIDERATION AND CLARIFICATION FILED BY AT&T, WORLDCOM,  
THE CLEC COALITION, AND Z-TEL**

Scott Sawyer  
Vice President, Regulatory Affairs  
Conversent Communications of Massachusetts, LLC  
222 Richmond Street  
Suite 301  
Providence, RI 02903  
Tel: (401) 490-6377  
Fax: (401) 490-6350

Dated: September 6, 2002

## TABLE OF CONTENTS

	<u>Page</u>
I. Conversent Does Not Object to VZ-MA's Cross-Connect Rate Restructuring, but Does Object to the Application of New NRCs to Cross-Connects Previously Ordered and Provisioned.....	1
A. Existing State Physical Collocation Tariff Provisions Concerning Cross-Connects...	2
B. Existing FCC Physical and Scope Collocation Tariff Provisions Concerning Cross-Connects.....	3
C. VZ-MA Rate Restructure and Transition Plan.....	3
D. VZ-MA's <i>Waiver</i> of NRCs for "Cross-Connects in Use" is Meaningless.....	5
E. VZ-MA's Offer to Return "Unused Cross-Connects" <i>for Free</i> is a Charade.....	5
F. The DTE Must Not Authorize VZ-MA to Charge New NRCs For Cross-Connects That Have Already Been Ordered and Provisioned Under State Tariff.....	6
G. The DTE Must Not Authorize VZ-MA to Charge New NRCs For Cross-Connects That Have Already Been Ordered and Provisioned Under Federal Collocation Tariff.....	7
II. The Department Failed to Consider Whether VZ-MA's Hot-Cut NRC will Provide CLECs with a Meaningful Opportunity to Compete.....	9